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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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5 CYNTHIA GUTIERREZ, JOSE HUERTA,)
SMH, RH and AH,)

Plaintiffs,
)

VS.)

SANTA ROSA MEMORIAL HOSPITAL,)

9 ST. JOSEPH HEALTH and DOES 1-50,
Inclusive,

10)

Defendants.

14 DEPOSITION OF CHART ANN TITUS

15 [CONTACT US](#) | [LAW OFFICES OF ROBERTSON](#)

16 North Tustin Avenue, Santa Ana

17 p.m. on Tuesday May 15 201

18 Follow GSP 11222

25 Job Number: 462595

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21 I N D E X

22 WITNESS: SHARI ANN TITUS

23 EXAMINATION BY: PAGE

24 MR. FLADSETH 5

25

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1 was him. Could have been him.

2 MR. FLADSETH:

3 Q. Okay. So, I notice that there's two different
4 kinds of reports in the emergency department. One's
5 called the emergency department report and one is called
6 ED summary report. Are you familiar with those things?

7 A. I know they exist in the system, yes.

8 Q. Okay. And can you tell me what the difference
9 between the two is?

10 A. Not without looking at the actual report.

11 I mean, I do know the summary -- just in general
12 functionality, the summary summarizes the visit.

13 Q. And when in relationship to the actual visit is
14 the summary report generated? I mean, is it the day of
15 the visit as soon as the patient's discharged, the
16 summary is automatically generated by the computer, or
17 how does that work?

18 A. There are, you know, timeframes and parameters
19 that define when that gets printed.

20 Q. Okay. What are they?

21 A. I recall we -- I'm trying to think.

22 MR. SCHOEL: If you know it, tell him. Otherwise,
23 don't start guessing or speculating.

24 THE WITNESS: Yeah, I don't want to guess.

25 MR. FLADSETH:

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1 **Q. Well, what's your understanding as to when the**
2 **ED summary report is prepared?**

3 A. It's typically a duration of time. It's
4 typically set for a duration of time that they would
5 believe that all information would be there. And so
6 that's the piece, is that specific duration of time that
7 it's set. It's not immediate. There is a -- It allows
8 for a period of time for things to be completed.

9 **Q. And so what goes into making up the ED summary**
10 **report?**

11 A. I can't speak to all of that.

12 **Q. Well, do you know anything that goes into making**
13 **up the ED summary report?**

14 A. I've seen ED summary reports before, and
15 typically they have, you know, documentation in them.
16 They have other information, but I don't study them.

17 I'm sorry. Go ahead.

18 **Q. What information did they typically have?**

19 A. You know, again, in viewing the report in
20 general, it's relevant to the individual visit of the
21 patient. So I've seen --

22 **Q. Is that a computer --**

23 A. Yes, it is computer-generated. It is a standard
24 report by the vendor.

25 **Q. By MEDITECH?**

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1 A. Because I think that -- I guess where I'm going,
2 I believe there's an ED summary that is an automatic, and
3 must be what you're referring to.

4 Because the user mnemonic that you read off is not
5 one that is an actual physical user. A user can demand
6 print certain things. But again, when you demand print,
7 it's printing as of this moment in time. If something is
8 system-generated, it's given a parameter of, you know,
9 when to generate it, and it generates at that time.

10 **Q. So do you know when, typically, the ED summary
11 report would be generated?**

12 A. I think -- I think this is the one that we
13 involved the vendor on; right? I think we went to the
14 vendor because we were unclear as to what was the
15 parameter and what -- you know, was it a specific window
16 of time when that prints.

17 And I believe they shared something in a 30-day
18 window, but it's not exact date to date.

19 **Q. Okay. Well, do you know when the 2-25-15 ED
20 summary report was first generated?**

21 MR. SCHOEL: Objection. She just answered that.

22 THE WITNESS: We went to the vendor to try to get an
23 explanation on when that would generate. We knew that
24 there was a window of time to try to figure it out.

25 So there is a window of time, and, honestly, I am

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1 STATE OF CALIFORNIA) ss

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3 I, Kathryn D. Jolley, CSR 11333, do hereby declare:

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5 That, prior to being examined, the witness named in
6 the foregoing deposition was by me duly sworn pursuant to
7 Section 2093(b) and 2094 of the Code of Civil Procedure;

8

9 That said deposition was taken down by me in
10 shorthand at the time and place therein named and
11 thereafter reduced to text under my direction.

12

13 I further declare that I have no interest in the
14 event of the action.

15

16 I declare under penalty of perjury under the laws of
17 the State of California that the foregoing is true and
18 correct.

19

20 WITNESS my hand this 21st day of
21 May, 2018.

22

Kathryn D. Jolley

23 _____
24 Kathryn D. Jolley, CSR 11333

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